

Bluestone Coke, LLC 3500 35th Avenue North Birmingham, AL 35207 (205) 808-7803

April 15, 2020

Transmitted Via Email

Wesley Hardegree, Project Manager United States Environmental Protection Agency Region 4 Atlanta Federal Center 61 Forsyth Street Atlanta, Georgia 30303-8960

RE:

Pilot Study

SMA 4 – Former Chemical Plant EPA ID Number: ALD 000 828 848

RCRA Docket Number: RCRA-04-2016-4250

Dear Mr. Hardegree:

Bluestone Coke, LLC is writing in regard to the United States Environmental Protection Agency's letter dated March 17, 2020. The letter specifically stated for Bluestone Coke to provide within thirty (30) calendar days from receipt of the letter an updated schedule to restart and complete Task 3 – ISCO Pilot Study from the approved CMI Work Plan. Further, it stated the Agency's expectation is that Task 3 should begin in the near future (i.e., May/June timeframe).

Bluestone Coke has been in contact and working with REGENESIS Remediation Services (Regenesis) to provide for the *in situ* chemical oxidation (ISCO) treatment utilizing RegenOx® PetroCleanzeTM to remediate a dissolved plume containing petroleum hydrocarbons at the Site located in Birmingham, AL. In whole, we expect to be in a position to make the first payment to Regenesis come June 1, 2020 for the material and delivery of the product to the site.

This payment will trigger a series of events that specifically outlines the project and moves it from one stage to another. Delivery of the product is expected to take approximately 5 days, therefore a crew from Regenesis will mobilize and be on site the following week. Once the crew is on site, the application will begin and is expected to be performed over a 13 day application stage. Lastly, volume extraction will be performed some 20 to 30 days after injection. This will conclude Event 1 and begin the start of Event 2. Event 2 is virtually a repeat of all actions of Event 1.

To re-cap, Bluestone Coke expects to be in a position to initiate this Project by the purchase of the material on or before June 1, 2020. If you have any questions concerning this matter, please contact me at (205) 808-7972 or dwiggins@bluestonecoke.com.

Sincerely,

Don Wiggins, Representative of the Company

Bluestone Coke, LLC

4200 FL Shuttlesworth Drive

Birmingham, AL 35207

Cc: Terry Rippstein, Terracon (via email)

Tiger Lambert, Bluestone Coke (via email)